

Summit Learning Marketing Website Privacy Policy

This Privacy Policy covers information we collect from users and visitors of the Summit Learning marketing website operated and controlled by Summit (“Summit,” “we,” “our” or “us”) that link to this Privacy Policy, including www.summitlearning.org (referred to as the “Site”). This Privacy Policy does not apply to Summit websites that do not link to this Privacy Policy, or to use of the Summit Learning Platform and associated software, which is covered by a separate policy.

By accessing or using the Site, you are consenting to the collection, use, disclosure and other handling of your information as described below. If you have any concern about providing information to us or having such information displayed on the Site or otherwise used in any manner permitted in this Privacy Policy, you should not use the Site.

1. The Information We Collect.

Information Submitted by You

Information about you. We collect the following information directly from you when you use the Site:

- When you submit an application, you provide us with information such as your name and email address, your title, and information about your school.
- If you create an account on our website, you will be required to create a username and password.
- If you subscribe to our newsletter, register for an event, schedule and/or participate in a chat, or fill out a form to submit an inquiry, you may provide your name, email address, and other information that you submit in connection with your request.

Information about others. You may provide information about others (e.g. school administrators), including their names, emails, and titles so that we may process your application. You should obtain the consent of such other individuals prior to providing us with their information.

Automatically Collected Information

We and third parties may use automated technologies, such as cookies, web server logs, and web beacons, to collect information about you, your computer or other device, and your use of the Site. Cookies are files that online services create and access on your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device to help us recognize you, improve your experience, increase security, and measure use of our Sites. Our Site may use HTTP cookies, HTML5 cookies, flash cookies and other types of local storage (such as browser-based or plugin-based local storage). Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. You also may be able to delete your Flash cookies or adjust your flash cookie settings by visiting the Adobe Flash Website Storage Settings Manager by

following Adobe's instructions [here](#). Please note, however, that disabling cookies may impact your use of the Site.

Web servers may log information such as your device type, operating system, mobile device identifier provided by your mobile device operating system, browser type, domain, and other system settings, the name of your ISP, as well as the language your system uses and the country and time zone where your device is located. The web server logs also may record information such as the address of the web page that referred you to our Site and the IP address of the device you use to connect to the Internet. They also may log information about your interaction with our Site, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called web beacons, which are files that link web pages to particular web servers and their cookies. We also may include web beacons in e-mail messages to measure the effectiveness of our marketing communications.

2. How We Use Information.

We use the information we collect about you to:

- Establish your account and provide the Site;
- Process your applications;
- Fulfill your requests and provide customized content to you;
- Communicate with you through email, notices posted on the website, and other means. Examples of these messages include: (1) service messages – to provide you with updates about the status of your application; and (2) promotional messages – to provide you with information about us or our partners that we think you might find interesting;
- Create, tailor, deliver and study the effectiveness of advertising and promotional material both on and off of the Site, as well as for analytics (including as described in the Online Analytics, Advertising and Do-Not-Track section below);
- Improve the Sites and to research and develop innovative features and services; and
- Investigate, prevent, or take action regarding unlawful or harmful activities, including potential threats to the physical safety of a person, potential fraud, and violations of our Terms.

Please note that we may anonymize and/or de-identify information collected through the Sites or via other means so that the information no longer relates to you. Where we have anonymized and/or de-identified information so that it no longer identifies you personally, our use and disclosure of such information is not subject to this Privacy Policy, and may be used and disclosed to others without restriction.

3. How We Share Information.

The information we collect may be shared with others for the following purposes:

- We may share your information with third-party companies who provide services on our behalf, which may include analytics, customer service, survey providers, marketing, and

fraud prevention. We may also authorize third-party companies to collect information on our behalf, including as necessary to operate features of our Site. Third-party companies have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.

- In connection with significant organizational events (for example, we may share or disclose information we have about you in the event we sell or transfer all or a portion of our organization or assets — such as in connection with a merger, acquisition, reorganization, dissolution or liquidation — or take steps in anticipation of any such event, such as due diligence);
- We may share or disclose certain data if we believe in good faith that doing so is necessary or appropriate (i) to protect or defend the rights, safety, or property of Summit or third parties, including to defend or enforce our Privacy Policy, Terms, customer agreements, or any other contractual arrangement; (ii) to comply with any law enforcement, legal, or regulatory process, such as to respond to a warrant, subpoena, court order, or other applicable laws and regulations; (iii) to respond to claims that content violates the rights of third parties; and/or (iv) with your consent or at your direction.

4. Online Analytics, Advertising and Do-Not-Track.

Online Analytics Providers

To help us better understand your use of the Site, we may use third-party analytics providers, [such as Google Analytics]. [You can find out more about Google's position on privacy as regards its analytics service at www.google.com/policies/privacy/partners/.] These third parties use the sorts of technologies described in the “Automatically Collected Information” section above. The information collected by this technology will be disclosed to or collected directly by these service providers.

Advertising Technology Providers

Data about your activities on our Site may be collected by us or by advertising technology providers for use in delivering online advertising tailored to your individual characteristics, activities, interests and other factors. These ad services may track your online activities over time and across the web by collecting information through automated means, including through the use of the various technologies described above, and they may use this information, and other information they receive from us or other sources, to deliver advertisements to you on our website, our emails, and other websites. We and third-party vendors may use first-party cookies and third-party cookies together, and other automated technologies, and in some cases additional information, (i) to inform, optimize, and serve ads based on past visits to our Site or other factors and (ii) to report how ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our Site or other factors.

You may visit the [Network Advertising Initiative's Consumer Opt-Out page](#) or the [Digital Advertising Alliance's Consumer Opt-Out page](#) to opt out of receiving tailored advertising based

on your Internet browsing activities from companies that participate in those programs. Some of our advertising-related activities may involve the services of companies that do not participate in those programs. For example, we use the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our Website. You can set preferences for how Google advertises to you using the [Google Ad Preferences page](#). The opt-outs apply only to the browser in which you set them. For example, if you set the opt-out while using Firefox, but then use Chrome, the opt-out will not be active in Chrome. To opt out in Chrome, you will need to repeat the opt-out process.

The opt-outs described in this Privacy Policy do not block or delete cookies, or prevent the use of cookies or other technologies for purposes other than selecting ads based on your interests as inferred by your online behavior. If you opt out, data may still be collected about your web browsing activities and you will still see advertising. Ads may be delivered based on other factors, such as the content of the web page in which they are shown, or demographic information obtained through other means.

Do Not Track Disclosure

Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. However, we do not recognize or respond to browser-initiated DNT signals, as the Internet industry is still working to determine what DNT means, how to comply with DNT, and how to create a common approach to responding to DNT.

5. Information Access, Correction, and Deletion Options.

If you need to modify, correct, access, or delete the information we have about you, please contact us using the contact information below.

6. Security.

We have implemented various technical, administrative, and physical safeguards to protect your information. These safeguards vary depending on the sensitivity of the information at issue.

7. Third Party Links and Sites.

The Site may contain links to third-party websites, applications and services, including social media services, as well as embedded images or other third-party content and features. Your use of these features may result in the collection, processing or sharing of information about you, depending on the feature. We are not responsible for the content, features, security or practices of any third parties. We do not vet, endorse, or make any representations about third parties or their websites, applications or services. The information you choose to provide to or that is collected by these third parties is not covered by our Privacy Policy.

8. Changes to this Policy.

This Privacy Policy may be modified from time to time as our business practices and legal requirements evolve. If this Privacy Policy is modified, we will provide appropriate notice of the change, and we will include the effective date of the update. Please review the changes carefully. If you disagree with the Privacy Policy, you must stop using the Service. If you continue to use the Site after we publish or communicate a notice about any changes to this Privacy Policy, you are consenting to such changes.

9. Children's Privacy.

The Summit Learning marketing website is not intended for use by children under the age of 13. We do not knowingly collect (or knowingly allow any third party to collect) personal information from persons under the age of 13. If we become aware that personal information has been collected from a person under the age of 13, we will delete this information and terminate the person's account as quickly as possible.

10. International Users.

The Site is hosted in the United States and are governed by United States law. If you are using the Site from outside the United States, please be aware that your information may be transferred to, stored and processed in the United States, where our databases are operated and our servers are located. The data protection and other laws of the United might not be as comprehensive as those in your country. By using the Site, you consent to your information being transferred to our facilities and to the facilities of those third parties with whom we share it as described in our Privacy Policy.

11. Your California Privacy Rights.

We do not disclose your personal information to third parties for their own direct marketing purposes without your consent. If you have any questions regarding this policy, you may contact us using the information in Section 13 below.

13. How to Contact Us.

If you have any requests, questions, comments, or concerns regarding our Privacy Policy or practices, please contact us at: info@summitbasecamp.org.